Rance & WRO v. Jefferson Village & McGrath

WRO Diversion of Resources and Frustration of Mission Estimates

Estimated Diversion of Resources Damages

Testing Expense

Two Tests Conducted 2018 \$ 3,600.00

Subtotal Testing \$ 3,600.00

Staff Timekeeping

<u>Date</u>	<u>Timekeeper</u>	Hours Rat	<u>e</u>	Am	ı <u>t</u>	Activity
						E Rance intake and complete intake form; call
	5/23/2017 AC	3.5	150	\$	525.00	with McGrath and circle back to Rance
	12/5/2017 AV	1.5	150	\$	225.00	Intake with E. Rance; complete intake form Corresp w/ E. Rance; prep RA letter and
	12/13/2017 CS	2.5	200	\$	500.00	transmit
						review intake files for Edwina Rance; research Jefferson Village availability; discuss test with
	3/9/2018 AS	1.75	200	\$	350.00	AV
	3/9/2018 AV	1	150	\$	150.00	discuss testing with AS
	3/12/2018 AS	0.5	200	\$	100.00	meet on Edwina Rance file
	3/12/2018 AV	0.5	150	\$	75.00	meet on Edwina Rance file
	3/12/2018 MZ	0.5	250	\$	125.00	meet on Edwina Rance file
	3/14/2018 AS	2.5	200	\$	500.00	research NYS law; discuss potential test
	3/20/2018 AV	1	150	\$	150.00	Meet with Edwina Rance and friend
	3/20/2018 AS	1	200	\$	200.00	Meet with Edwina Rance and friend
	3/20/2018 MZ	0.25	250	\$	62.50	Meet with Edwina Rance and friend Corresp w/ MZ and AV re: Rance and timeline
	3/21/2018 AS	0.25	200	\$	50.00	prep
	3/21/2018 MZ	0.5	250	\$		Call with counsel; email to AS
	3/22/2018 AV	2	150	\$	300.00	Prep timeline Review timeline and file; prep timeline and
	3/22/2018 AS	1.5	200	\$	300.00	summary
	3/26/2018 AV	0.5	150	\$	75.00	Corresp w/ Rance on therapist letter Review therapist letter and corresp with
	3/26/2018 AS	0.5	200	\$	100.00	Rance
	4/25/2018 MZ	0.5	250	\$	125.00	Corresp on counsel referral for Rance matter
	5/3/2018 AS	0.5	200	\$	100.00	Call with counsel on Rance matter
	5/10/2018 MZ	0.5	250	\$	125.00	Send files to JB on Rance matter
	5/11/2018 MZ	0.5	250	\$	125.00	T/c with JB on Rance matter
	5/11/2018 AS	0.5	200	\$	100.00	T/c with JB on Rance matter
	5/14/2018 MZ	0.5	250	\$	125.00	Meet with AS on counsel for Rance

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				Meet with MZ to discuss referral. Call to ER to
5/14/2018 AS	1.25	200	\$ 250.00	discuss counsel referral
5/17/2018 AS	0.25	200	\$ 50.00	Corresp w/ E Rance on counsel referral
5/18/2018 MZ	0.25	250	\$ 62.50	Corresp w/ counsel (JB) on Rance matter
5/18/2018 AS	0.5	200	\$ 100.00	Corresp w/ counsel (JB) on Rance matter Corresp w/ counsel (JB) on referral of Rance
6/4/2018 MZ	0.5	250	\$ 125.00	matter
				Gather, scan and transmit intake file
6/5/2018 AS	1	200	\$ 200.00	documents to counsel (JB)
6/12/2018 AS	0.25	200	\$ 50.00	corresp w/ E. Rance on matter
7/9/2018 MZ	0.5	250	\$ 125.00	Corresp with counsel on Rance referral
7/10/2018 AS	0.5	200	\$ 100.00	Corresp with counsel (JB) on Rance testing
7/11/2018 MZ	0.2	250	\$ 50.00	W/c to and from counsel (JB)
				Email to Jim re: Rance intake and discussion
7/12/2018 AC	0.75	150	\$ 112.50	with management company
				Conference with AS & MZ; Call with counsel
7/12/2018 AS	0.4	150	\$ 60.00	(JB)
				Conference with AS & MZ; Call with counsel
7/12/2018 MZ	0.4	250	\$ 100.00	(JB)
				review joint retainer agreement and to GA for
7/18/2019 MZ	1	250	\$ 250.00	execution
				review draft complaint and prep track
7/19/2018 AS	2	200	\$ 400.00	changes comments for counsel (JB)
7/20/2018 MZ	1	250	\$ 250.00	review draft complaint
7/26/2018 AS	0.25	200	\$ 50.00	corresp with GA on filing complaint

Subtotal staff time \$ 6,372.50

Estimated Frustration of Mission Damages

\$1800/test x 15 Tests of

Coop/Condos/Management Cos. for Disability

Monitoring/investigate compliance by Similar \$ 27,000.00 Discrimination

Fair Housing Training for McGrath and JV Staff \$ 6,000.00 \$2000 x 3 trainings over 3 years

Monitor compliance with settlement \$ 3,600.00 \$150/hour x 8 hours x 3 years

Education and Outreach on Mental Health Disability \$ 12,000.00 \$400/event x 10 events x 3 years

FM Subtotal \$ 48,600.00

TOTAL \$ 58,572.50